GAVIN ROZZI

PO Box 1232 Forked River, NJ 08731 (609)-222-4161 gr@gavinrozzi.com

Plaintiff, Pro Se

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

GAVIN ROZZI

Plaintiff,

v.

ROBERT SELFORS, a/k/a "BOB HANSEN," individually and in his capacity as President of Happy Panda, Inc., CANA WITTENBERG SELFORS, individually and in her capacity as President of Simple Websites, Inc. and Vice President of Happy Panda, Inc., HAPPY PANDA, INC., a North Carolina Corporation, SIMPLE WEBSITES, INC., a North Carolina Corporation, BRIER CREEK FELLOWSHIP, INC. a North Carolina Nonprofit Corporation, JOHN DOES 1-100, ABC ENTITIES 1-100

Defendants.

Civil Action

No.: 3:23-cv-03363-RK-DEA

PLAINTIFF'S AFFIDAVIT
IN SUPPORT OF REQUEST FOR
CLERK'S ENTRY OF DEFAULT
AGAINST DEFENDANTS HAPPY
PANDA, INC. AND SIMPLE
WEBSITES, INC.

STATE OF NEW JERSEY COUNTY OF OCEAN

- I, Gavin Rozzi, being a *pro se* plaintiff and of legal age, after first being duly sworn, according to law do hereby affirm and state as follows:
 - 1. I am making this Affidavit in support of my request for a Clerk's entry of default against Defendants Happy Panda, Inc. and Simple Websites, Inc. (collectively, "Defendants").

- 2. On July 10th, 2023, Defendants were duly served with a copy of the Complaint and Summons in this matter at their respective Registered Office addresses.
- 3. Plaintiff filed an Affidavit of Service with this Court on July 10th, 2023, documenting these two successful service attempts (See ECF No. 7). A true and correct copy of the same is attached to this Affidavit as "Exhibit A."
- 4. After being served with the process commencing this matter, Defendants had 21 days to answer or move in response to the Complaint.
- 5. July 31st, 2023 was the deadline for Defendants to respond, yet nothing was filed with the Clerk's office within the time provided, and no extension was sought.
- 6. Plaintiff has made multiple attempts to communicate with the Defendants in this matter via their Registered Agents, Robert Selfors and Cana Wittenberg Selfors, respectively, with no response or communications from them.
- 7. Plaintiff has consulted the records of the United States Department of Defense in accordance with the Servicemembers' Civil Relief Act (SCRA) and has confirmed that the registered agents of these legal entities are not currently members of the U.S. military.
- 8. Defendants Happy Panda, Inc. and Simple Websites, Inc. are now in default and Clerk's entry of default should issue as to Happy Panda, Inc. and Simple Websites, Inc.

I swear and affirm that the statements contained herein are true and correct to the best of my knowledge under penalty of perjury under the laws of the United States of America. I am aware that if any statement contained herein is knowingly false or misleading, then I am subject to punishment.

Dated this 1st Day of August 2023.

GAVIN ROZZI Plaintiff, *Pro Se*